

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-20171-Cr (PAS)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANDREW CHORLIAN,

Defendant.

---

**AMENDED CONSENT MOTION TO PERMIT TRAVEL**

Your Honor previously granted Andrew Chorlian's consent motion (DE 34 and DE 35) to travel to Andover, New Jersey to attend his brother-in-law's wedding on March 30, 2024. We respectfully request that the Order be amended to permit Mr. Chorlian to return to his home in Brooklyn by 2:00 pm on March 31, 2024. Probation Officer Sabrina Gargano, who is monitoring Mr. Chorlian in Brooklyn, advised defense counsel that she is not authorized to consent to the request since Mr. Chorlian will be on electronic monitoring and thus takes no position on the request. AUSA Andrew Jaco consents to the request.

**Wherefore,** Mr. Chorlian respectfully requests that Your Honor permit him to return to Brooklyn from his brother-in-law's wedding by 2:00 pm on March 31, 2024.

Respectfully submitted,

BACHNER & ASSOCIATES, PC  
111 Broadway, Suite 701  
New York, NY 10006  
T: (212) 344-7778  
F: (212) 344-7774

By:

Michael F. Bachner

Michael Bachner, Esq. pro hac vice counsel

FRIDMAN FELS & SOTO, PLLC

2525 Ponce de Leon Boulevard

Suite 750

Coral Gables, FL 33134

Tel: (305) 569-7701

Fax: (786) 627-4145

By: s/Adam Fels

Adam Fels, Esq.

Florida Bar No.: 0114917